



FLORENCE COPPER INC.

1575 W. Hunt Highway, Florence, Arizona 85132 USA

florencecopper.com

February 04, 2021

Maribeth Greenslade
The Arizona Department of Environmental Quality
Groundwater Protection Value Stream
Mail Code 5415B-3
1110 West Washington Street
Phoenix, Arizona 85007

Dear Ms. Greenslade:

Florence Copper is sending this letter in response to requirements for fluid electrical conductivity (EC) listed under Section 2.6.2.9 and Table 15 of Aquifer Protection Permit (APP) No. P-101704, LTF 76820. The APP alert level (AL) for fluid EC is exceeded when observation well conductivity is equal to or greater than injection well conductivity. Monitoring of the fluid EC measurements in the injection and observation wells is intended to demonstrate hydraulic control during leaching activities in the wellfield. During rinsing activities however, comparison of fluid EC measurements in injection and observation wells is not an effective means of doing so and produces a significant potential for false positive reporting of this monitoring element. Florence Copper is currently in the process of rinsing the wellfield and, as expected, injection well conductivity measurements have fallen below observation well conductivity measurements. An Other Amendment to the Temporary APP (Permit No. P-106360) was processed and approved by ADEQ on November 2, 2020 which accounted for this change, and resulted in a footnote to Table 4.1-8. It was Florence Copper's understanding that this provision would also be applied to APP Permit No. P-101704, which was issued in December 2020, and subsumed most of the requirements from the Temporary APP. Please let us know if you need any further information to incorporate this provision into Permit No. P-101704 during the next amendment process for this permit.

Until this provision is added to Permit No. P-101704, this letter is presented to serve as notification that the AL for fluid EC in the APP Permit No. P-101704 will be exceeded on a daily basis during rinsing activities and that this does not indicate a loss of hydraulic control.

Sincerely,
Florence Copper, Inc.

A handwritten signature in blue ink, appearing to read 'Brent Berg', with a long horizontal flourish extending to the right.

Brent Berg
General Manager

Cc: Nancy Rumrill, EPA